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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland Division

**AHM**, by and through her Guardian *ad litem* and father David Mark Morrison, and  
**David Mark Morrison**, individually,

Plaintiffs,

v.

**Portland Public Schools**,

Defendant.

CV No. 3:11-CV-00739-MO

PORTLAND PUBLIC SCHOOLS'  
MOTION FOR SUMMARY  
JUDGMENT

**ORAL ARGUMENT REQUESTED**

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**LR 7.1 CERTIFICATION**

Counsel for defendant Portland Public Schools conferred with counsel for plaintiffs AHM and David Mark Morrison, but the parties have been unable to do resolve the dispute.

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## INTRODUCTION

Pursuant to Fed. R. Civ. P. 56, defendant Portland Public Schools ("PPS") moves the court for summary judgment against plaintiffs AHM and David Mark Morrison. PPS's motion is based on the accompanying Portland Public Schools' Memorandum in Support of Motion for Summary Judgment, the Declaration of Bruce Campbell in Support of Portland Public Schools' Motions to Exclude or Strike Plaintiffs' Expert Reports and for Summary Judgment, and the exhibits filed therein.

DATED this 6th day of April, 2012.

MILLER NASH LLP

s/ Bruce L. Campbell

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I hereby certify that I served the foregoing Portland Public Schools' Motion for  
Summary Judgment on:

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by the following indicated method or methods:

- ☒ **CM/ECF system transmission.**
- ☐ **E-mail.** As required by Local Rule 5.2, any interrogatories, requests for production, or requests for admission were e-mailed in Word or Wordperfect format, not in pdf, unless otherwise agreed to by the parties.
- ☐ **Facsimile communication device.**
- ☐ **First-class mail, postage prepaid.**
- ☐ **Hand-delivery.**
- ☐ **Overnight courier, delivery prepaid.**

DATED this 6th day of April, 2012.

s/ Bruce L. Campbell  
Bruce L. Campbell, P.C., OSB No. 925377

Of Attorneys for Portland Public Schools